

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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|--------------|---|------------------------|
| IN RE:       | : |                        |
|              | : |                        |
| Anita Butler | : | Case No.: 16-14484-mdc |
|              | : |                        |
| Debtor(s)    | : | Chapter 13             |

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Anita Butler, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about June 23, 2016.
2. The Chapter 13 filing was assigned case number 16-14484-mdc.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about April 22, 2017.
4. On October 15, 2020, Debtor filed a Motion to Modify her plan to extend her plan to 84 months pursuant to the CARES Act.
5. On December 1, 2020, this Honorable Court entered an order granting the motion and the modified plan.
6. On December 4, 2020, the Mortgage company, Lakeview Loan Servicing, amended their proof of claim.
7. Debtor respectfully requests that she be allowed to modify her plan to address the amended claim filed by Lakeview Loan Servicing.
8. In furtherance of the Motion and the Debtor curing the arrears pursuant to the amended claim, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

9. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "Exhibit A", is affordable by the Debtor.

**WHEREFORE**, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: December 10, 2020

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtor  
1315 Walnut Street  
Suite #502  
Philadelphia, PA 19107